

BEJON KUMAR MISRA

International Consumer Policy Expert



www.theawareconsumer.in

F-9, 2nd Floor, Kailash Colony, New Delhi 110048, INDIA • Mobile: +91 9811044424, 9311044424 Telefax: +91-11-40537140 • E-mail: bejonmisra@gmail.com; bejonmisra@consumerconexion.org

27th September 2019

Dr. R. S. Sharma, Chairman
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan (next to Zakir Hussain College)
Jawaharlal Nehru Marg (Old Minto Road), New Delhi: 110 002

Dear Dr. Sharma,

Subject: URGENT Request from Indian Consumers on the adherence of the 'The Telecommunication Interconnection Usage Charges (Thirteenth Amendment) Regulations, 2017' dated 19th September 2017'

On behalf of the voiceless Indian Consumers I would like to draw your urgent attention to your recent consultation paper on reviewing the Interconnection Usage Charges (IUC) floated on 18th September 2019. As per 'The Telecommunication Interconnection Usage Charges (Thirteenth Amendment) Regulations, 2017' dated 19th September 2017, notified by you, IUC payable between telecom operators for call termination was reduced from 14 paise to 6 paise from 1st October 2017. Further Bill and Keep (BAK) is scheduled to be effective from 1st January 2020.

BAK has several beneficial effects on the Indian Consumer as well as the industry, as discussed in the extracts from the explanatory memorandum of 'The Telecommunication Interconnection Usage Charges (Thirteenth Amendment) Regulations, 2017' dated 19th September 2017, which you are a party but unfortunately due to reasons know to you, has been overlooked and you will agree with me are not in the interest of the consumers to defer the BAK date of compliance.

The role of TRAI is to ensure the healthy growth of the telecom sector as well as look after the interests of the consumer who is the ultimate beneficiary of the services provided by the TSPs. However, by seeking to defer the deadline for shifting to BAK, unfortunately it appears to me that you are biased and tilting heavily towards the incumbent telecom operators who have done little to upgrade their networks. They are reluctant to move their subscribers to IP based services and continue to provide services using inefficient and out-dated technologies.

Globally, 5G trials are being conducted, while in some countries 5G networks have already been deployed. India is already a late entrant in 5G, as it has not yet begun trials. The networks of the incumbent operators require serious modernization to roll out 5G; rescheduling BAK will further encourage operators to delay investments in modernizing their networks and compromise quality service to the Indian consumer.

Would earnestly request you to bring about Bill And Keep (BAK) as per the schedule i.e. 1st January, 2020 as this will be in the best interest of the Indian consumers as well encourage modernization of the telecom infrastructure on fast track for a truly digitally enabled India.

Yours Sincerely

Prof. Bejon Kumar Misra

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